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November 13, 2001

**PUBLIC VERSION**

Gloria Blue, Executive Secretary  
TPSC, Office of the USTR  
600 17<sup>th</sup> Street, NW  
Washington, DC 20508

Re: Product Exclusions, Certain Steel Products, USITC Inv. No. TA-201-73

Dear Secretary Blue:

On behalf of Bohler Edelstahl and in accordance with USTR's request for comment, 66 FR 54321 (October 26, 2001), we submit a request to exclude certain Electro Slag Remelt and Vacuum Arc Remelt stainless steel from import relief under section 203. We attach the Exclusion Request Data Sheet submitted to the USITC, and product specifications.

We request confidential treatment for this submission because it contains Bohler Edelstahl's sales data for the US.

**(a) Designation under a recognized standard or certification**

HTS 7220.11.0000; HTS 7222.19.0050; HTS 7222.19.0005; HTS 7222.30.0000; HTS 7222.11.0050; HTS 7222.11.0005

Customer specifications: GE B50 A951; GE B50 A790; GE B50 A365; WH 10705 BL; GE B50A789; GE B50A809; GE B50A305; GE B50A651; BMS 5719

Standards: AISI 422; AMS 5662; AMS 5898; AMS 5719



**(b) Description based on physical characteristics**

Rolled or forged bars of Electro Slag Remelt (ESR) or Vacuum Arc Remelt (VAR) stainless steel and nickel alloys in black or peeled condition used in power generation and aviation manufacturing.

**(c) Basis for exclusion**

The domestic US industry does not produce ESR/VAR in sufficient quantities to meet US domestic requirements. Generally, qualification as a supplier of ESR/VAR takes from one to two years.

**(d) Names of domestic and foreign producers**

Bohler Edelstahl

**(e) Total US consumption 1996-2000 (in short tons) (estimate)**

1996	1997	1998	1999	2000
NOT AVAILABLE				

(We are unable to provide realistic demand projections because Bohler Edelstahl's sales of this product are dependent on the requirements of the US power generation and aviation industries.)

**(f) Total US production 1996-2000 (in short tons) (estimate)**

1996	1997	1998	1999	2000
7,716	7,716	7,716	8,267	8,818

**(g) Identity of US produced substitute products**

There are no substitutes for this product.

Respectfully submitted,



David L. Simon

